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February 14, 2025

VIA ECF

Honorable Renée Marie Bumb
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
Courtroom 3D
4th and Cooper Streets
Camden, New Jersey 0810

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower,
Suite 1800
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Chief Judge Bumb and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs regarding the schedule for the
Wave 2 bellwether pool.

Plaintiffs propose that the Wave 2 trial at the end of 2025 be a multi-plaintiff
trial, which will be more efficient. Scheduling a multi-plaintiff trial will also address
Defendants' concern that a case may drop out before trial, leaving an additional case
or cases ready for trial in that event.

Honorable Renée Marie Bumb, U.S.D.J.
Honorable Thomas I. Vanaskie (Ret.)
February 14, 2025
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Plaintiffs have attached a proposed schedule for the multi-plaintiff trial, with the most important date being for the service of case-specific expert reports, which require a complete factual record and significant additional time and work in order to complete, also showing Plaintiffs' understanding of Defendants' proposed deadlines. (Ex. 1). Although the briefing schedule and later pretrial events partially overlap with the Roberts trial, the Parties and Court will have the benefit of the Roberts rulings by that time, which will allow the Court to more efficiently address the legal issues for the Wave 2 trial.

We look forward to discussing the Wave 2 schedule with the Court.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)

Encl.